

Before the
Federal Communications Commission
Washington, DC

In the Matter of)

*Amendment of Section 202(b),
Table of Allotments,
FM Broadcast Stations
(Cordele, Hawkinsville &
Montezuma, Georgia)*

To: Chief, Allocations Branch)

MM Docket No. 99-199
RM-9564

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JUN 23 1999

**COMMENTS IN SUPPORT OF
NOTICE OF PROPOSED RULE MAKING**

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Metro Com Corp., licensee of Station WKKN(FM), Cordele, Georgia ("WKKN"), Broadcast Equities Corp, permittee of BPH-970925NH, Montezuma, Georgia ("BEC"), and Tri-County Broadcasting Company, licensee of Station WQSY(FM), Hawkinsville, Georgia ("WQSY"), by their attorney, hereby submit their comments in support of the *Notice of Proposed Rule Making*, DA 99-1002 (May 28, 1999). With respect thereto, the following is stated:

The Petitioners proposed that the Commission amend the Table of Allotments as follows:

| <u>Community</u> | <u>Current</u> | <u>Proposed</u> |
|-----------------------|----------------|-----------------|
| Cordele, Georgia | 212A, 252A | 212A, 236C3 |
| Montezuma, Georgia | 236A | 280C3 |
| Hawkinsville, Georgia | 280C3 | 252C3 |

Petitioners also requested the modification of the licenses for WKKN and WQSY, and the permit for Montezuma, accordingly. As demonstrated in the Petition, adoption of this proposal would be in full accord with the Commission's technical spacing rules. Moreover, grant of the

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proposal will allow two stations to upgrade their facilities from Class A to Class C3, resulting in a net gain of service to 107,038 persons. This will amount to service to over *twice* as many persons and areas as is permitted under the licensees' and permittee's current authorizations.

In the *NPRM*, the Commission agreed that the proposal advanced by the Petitioners warranted consideration since the allotment of Channels 236C3 at Cordele and 280C3 at Montezuma could provide each community with a wide coverage area FM service and enable the stations to provide service to a greater number of people. Further, the Commission stated that its own engineering study confirmed that the proposal did constitute an incompatible channel swap in that the proposed channels are the only Class C3 channels which can be allotted to each community.

However, in light of the fact that the substitution of channels at Hawkinsville, based upon the hypothetical allocation reference point, will result in a hypothetical loss of service to 3,955 persons, the Commission requested that the Petitioners provide a study showing the reception services which will remain in the loss area if Channel 252C3 is substituted for Channel 280C3. The Technical Comments of the Petitioner's Consulting Engineer requested by the Commission are attached hereto. Exhibit 1 of the Technical Comments shows the hypothetical loss area. Exhibit 2A-2C and 3A-3C shows the existing services that will continue to be provided to the hypothetical loss area. As can be seen, the hypothetical loss area will continue to be served by a wide range of existing AM and FM aural services, even after the Petitioners' proposal is adopted and implemented.

The Petitioners pledge to apply for construction permits for the new allotments if the new allotments are adopted made, and to construct and commence operations of such modified

stations as promptly as possible.

Accordingly, Metro Com Corp., Broadcast Equities, Inc., and Tri-County Broadcasting Company respectfully request that this Petition be adopted, and that the Commission amend the FM Table of Allotments in the manner proposed as expeditiously as possible.

Respectfully submitted,

**TRI-COUNTY BROADCASTING
COMPANY**

METRO COM CORP.

BROADCAST EQUITIES CORP.

By: 

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June 23, 1999

Comments To
MM Docket No. 99-199, RM-9564
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June 1999

Technical Comments

These Technical Comments are in reply to MM Docket No. 99-199, RM-9564. In the Notice Of Proposed Rule Making adopted May 19, 1999, released May 28, 1999 regarding the abovereferenced docket, Paragraph 3 requires the petitioners to examine services in the "loss area" if Channel 252C3 is substituted for Channel 280C3 at Hawkinsville, Georgia.

Exhibit Number 1 is the licensed and proposed 60 dBu service area and the resulting loss area. Exhibits 2A, 2B, and 2C indicate 60 dBu FM services to the loss area. The loss area is shaded. Exhibits 3A, 3B, and 3C show 0.5 mV/m AM service to the loss area.

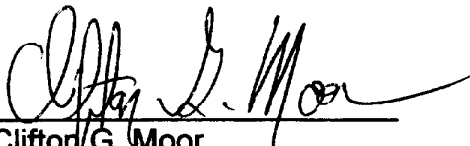
Stations serving all or part of the loss area are:

| <u>STATION</u> | <u>CITY</u> | <u>EXHIBIT</u> |
|----------------|-------------|----------------|
| WAFI | Unidilla | 2A |
| WAYS | Macon | 2A |
| WDEC | Americus | 2A |
| WDEN | Macon | 2A |
| WFFM | Ashburn | 2A |
| WGBC | Albany | 2A |
| WGPC | Albany | 2A |
| WIBB | Fort Valley | 2B |
| WISK | Americus | 2B |
| WJAD | Leesburg | 2B |

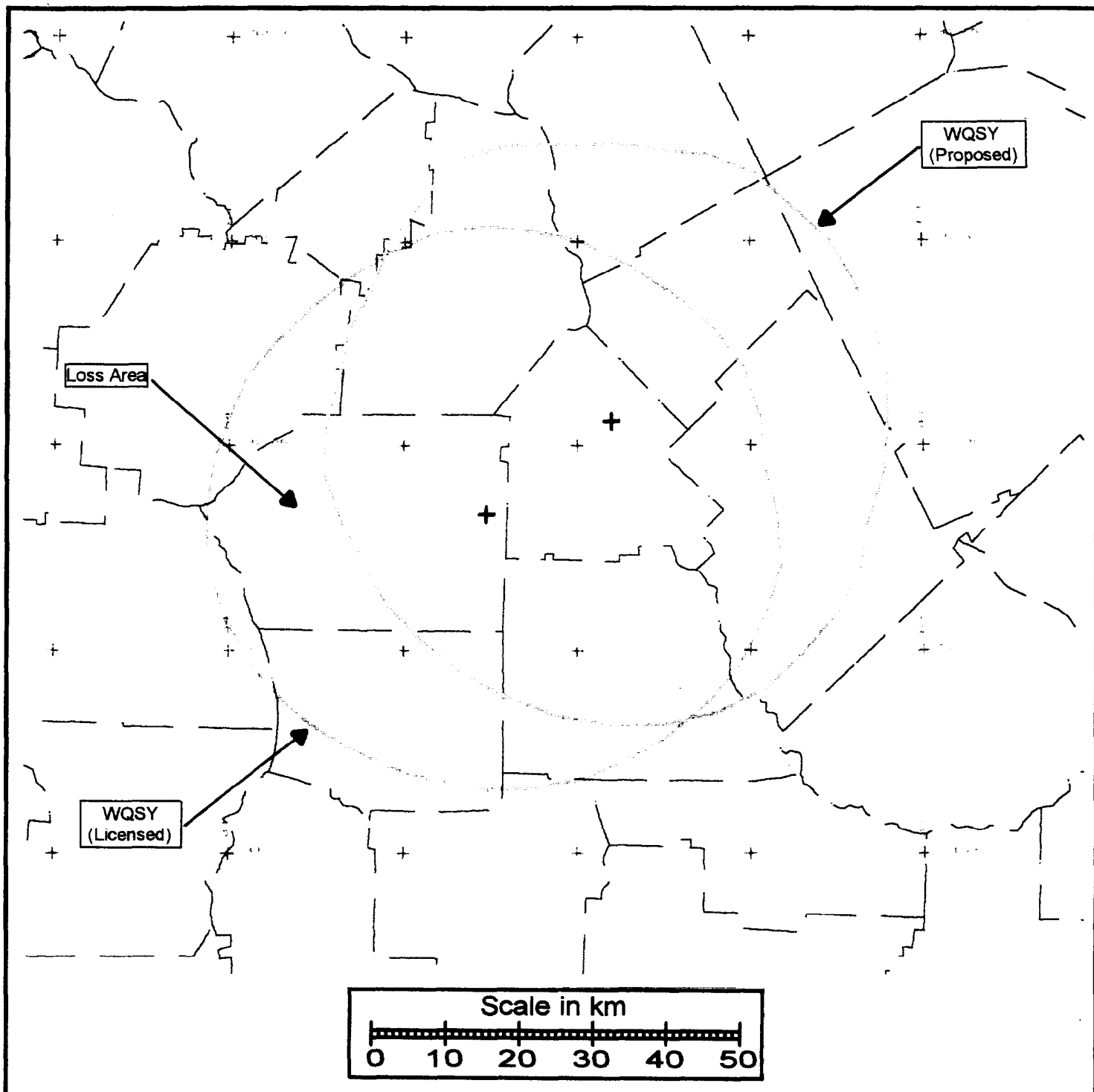
| | | |
|------|----------------|----|
| WJIZ | Albany | 2B |
| WKKN | Cordele | 2B |
| WLGC | Warner Robbins | 2B |
| WOBB | Tifton | 2C |
| WPEZ | Macon | 2C |
| WPGA | Perry | 2C |
| WQBZ | Fort Valley | 2C |
| WRDO | Fitzgerald | 2C |
| WVRK | Columbus | 2C |
| WDDO | Macon | 3A |
| WCOP | Warner Robins | 3A |
| WCEH | Hawkinsville | 3A |
| WBHB | Fitzgerald | 3A |
| WDMG | Douglas | 3A |
| WBNM | Gordon | 3A |
| WBML | Macon | 3A |
| WMNZ | Montezuma | 3B |
| WISK | Americus | 3B |
| WJYZ | Albany | 3B |
| WMGA | Moultrie | 3B |
| WMAC | Macon | 3B |
| WLCG | Macon | 3B |
| WNEX | Macon | 3B |
| WPGA | Perry | 3C |
| WWWN | Vienna | 3C |
| WRNC | Warner Robins | 3C |
| WXKO | Fort Valley | 3C |

In conclusion it is easily seen that the entire loss area is served by multiple exsisting AM and FM broadcast services.

All information contained herein is thought to be true and accurate to the knowledge of the undersigned.


Clifton G. Moor
Bromo Communications, Inc.

June 22, 1999



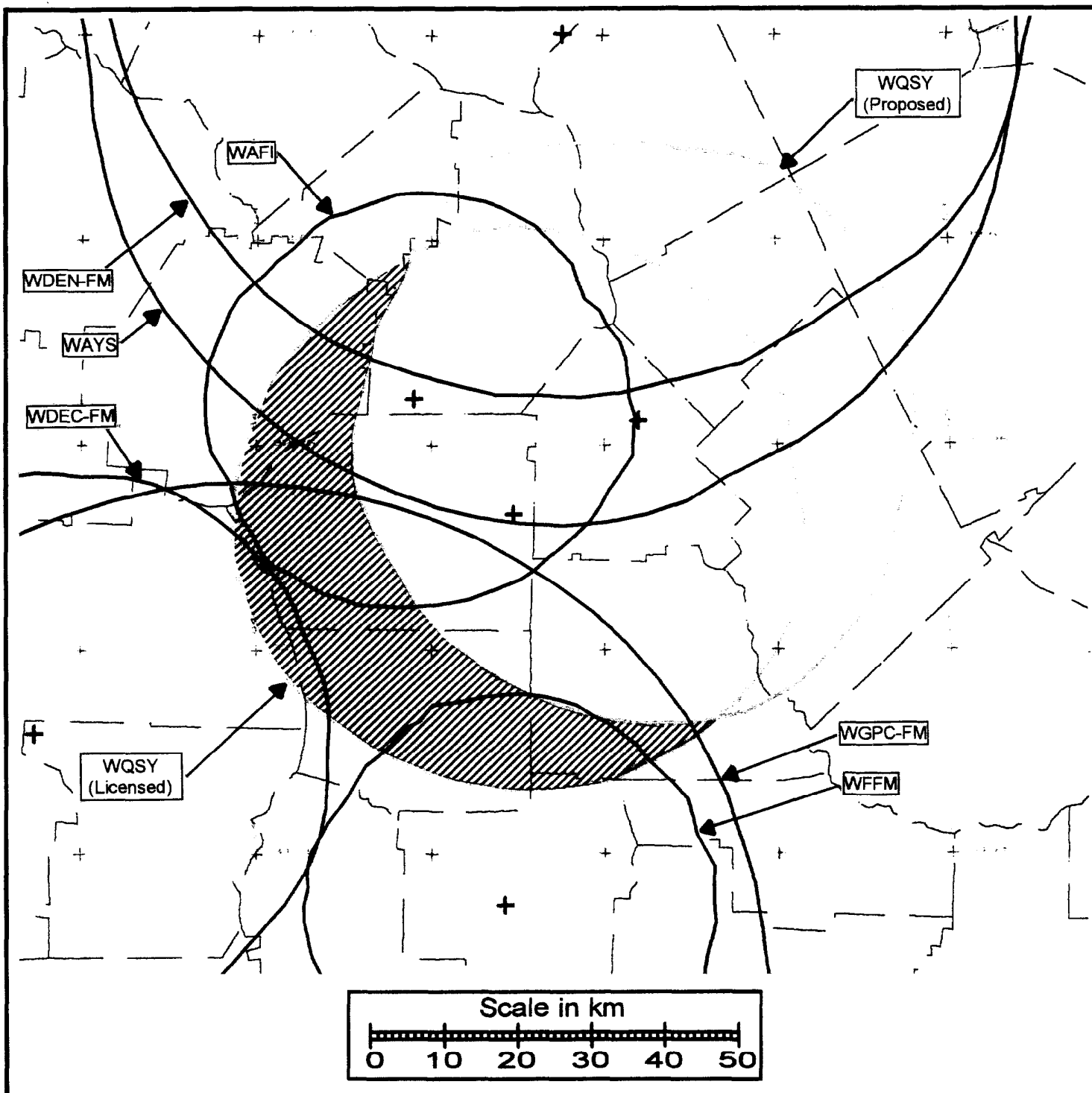
Loss Area

All FM contours are 60 dBu

Map generated using InterDLG from V-Soft Communications

EXHIBIT #1
Comments to
MM Docket 99-199, RM-9564
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FM Services to Loss Area

Shaded Area = Loss Area

All FM contours are 60 dBu

Map generated using InterDLG from V-Soft Communications

EXHIBIT #2A

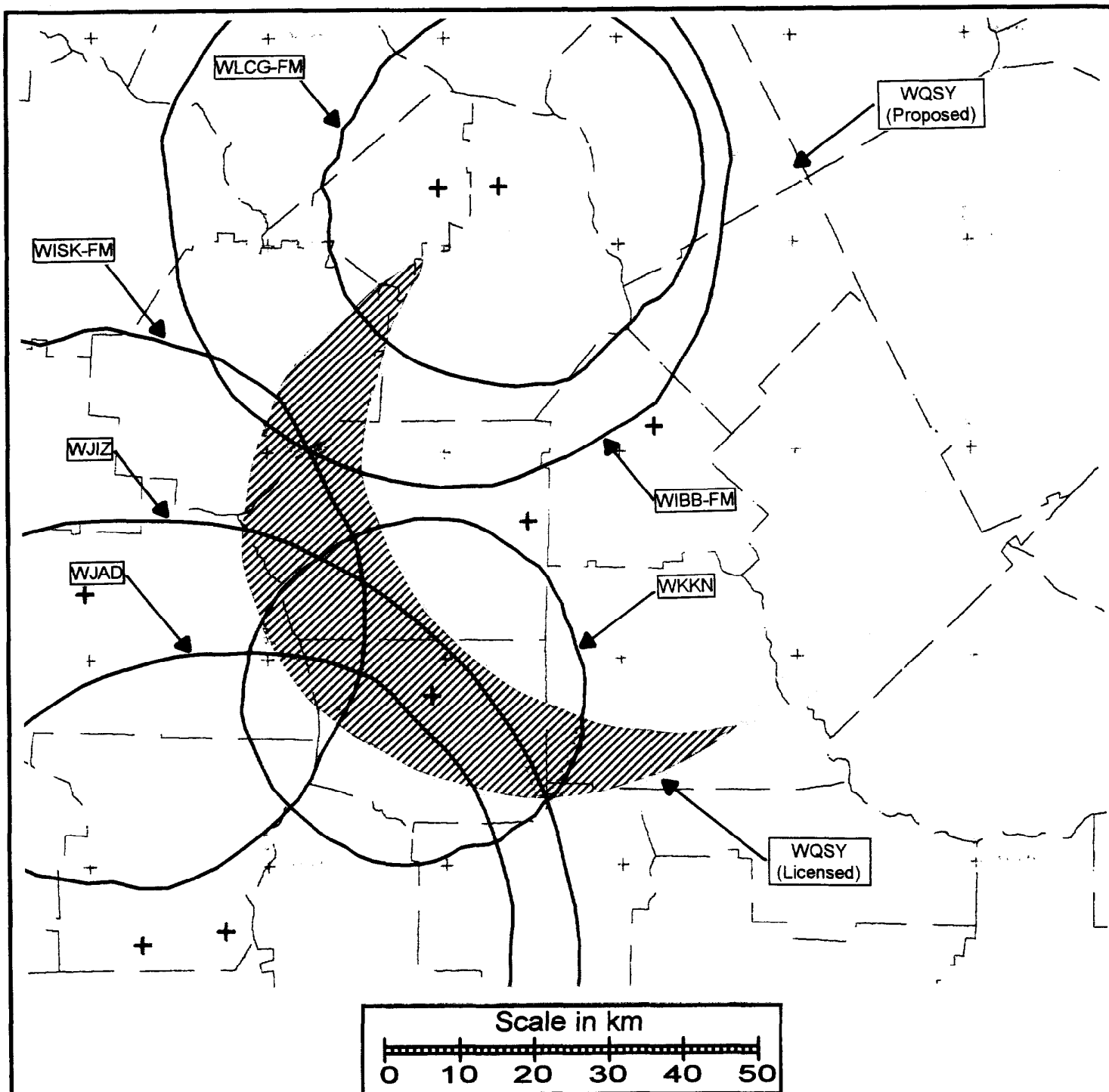
Comments to

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June 1999

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FM Services to Loss Area

Shaded Area = Loss Area

All FM contours are 60 dBu

Map generated using InterDLG from V-Soft Communications

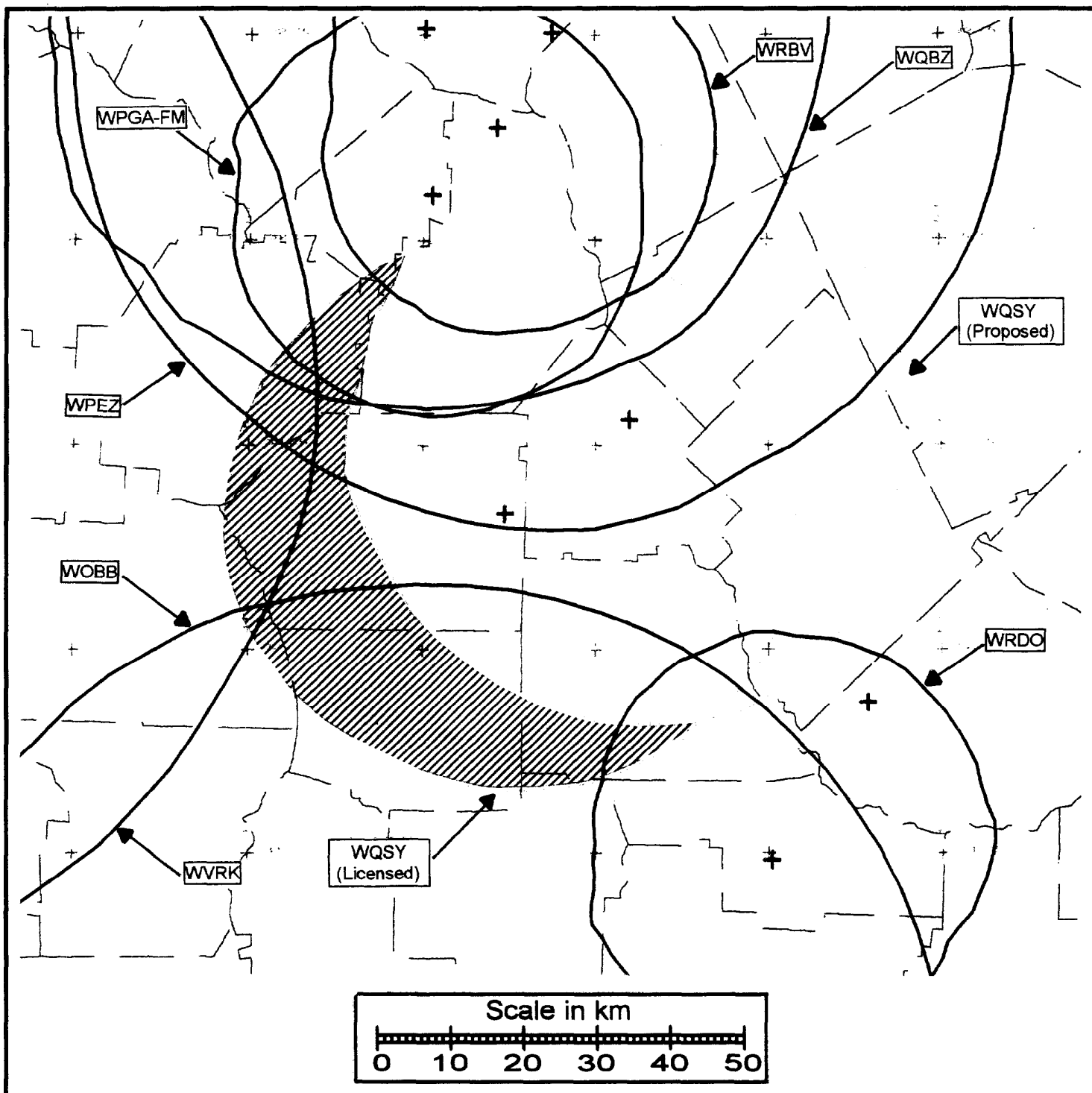
EXHIBIT #2B

Comments to

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FM Services to Loss Area

Shaded Area = Loss Area

All FM contours are 60 dBu

Map generated using InterDLG from V-Soft Communications

EXHIBIT #2C

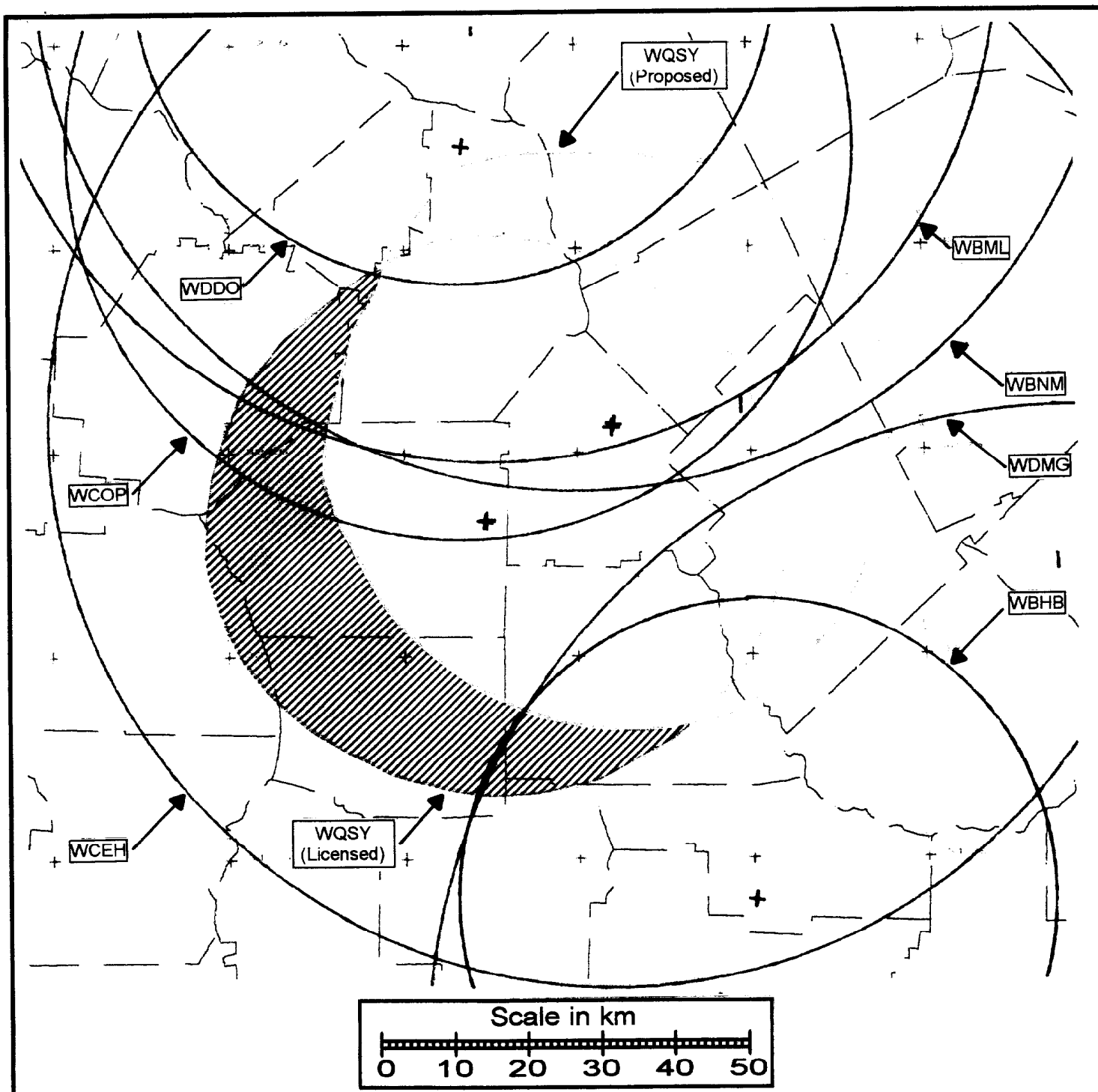
Comments to

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AM Services to Loss Area

Shaded Area = Loss Area

All AM contours are 0.5 mV/m

Map generated using InterDLG from V-Soft Communications

EXHIBIT #3A

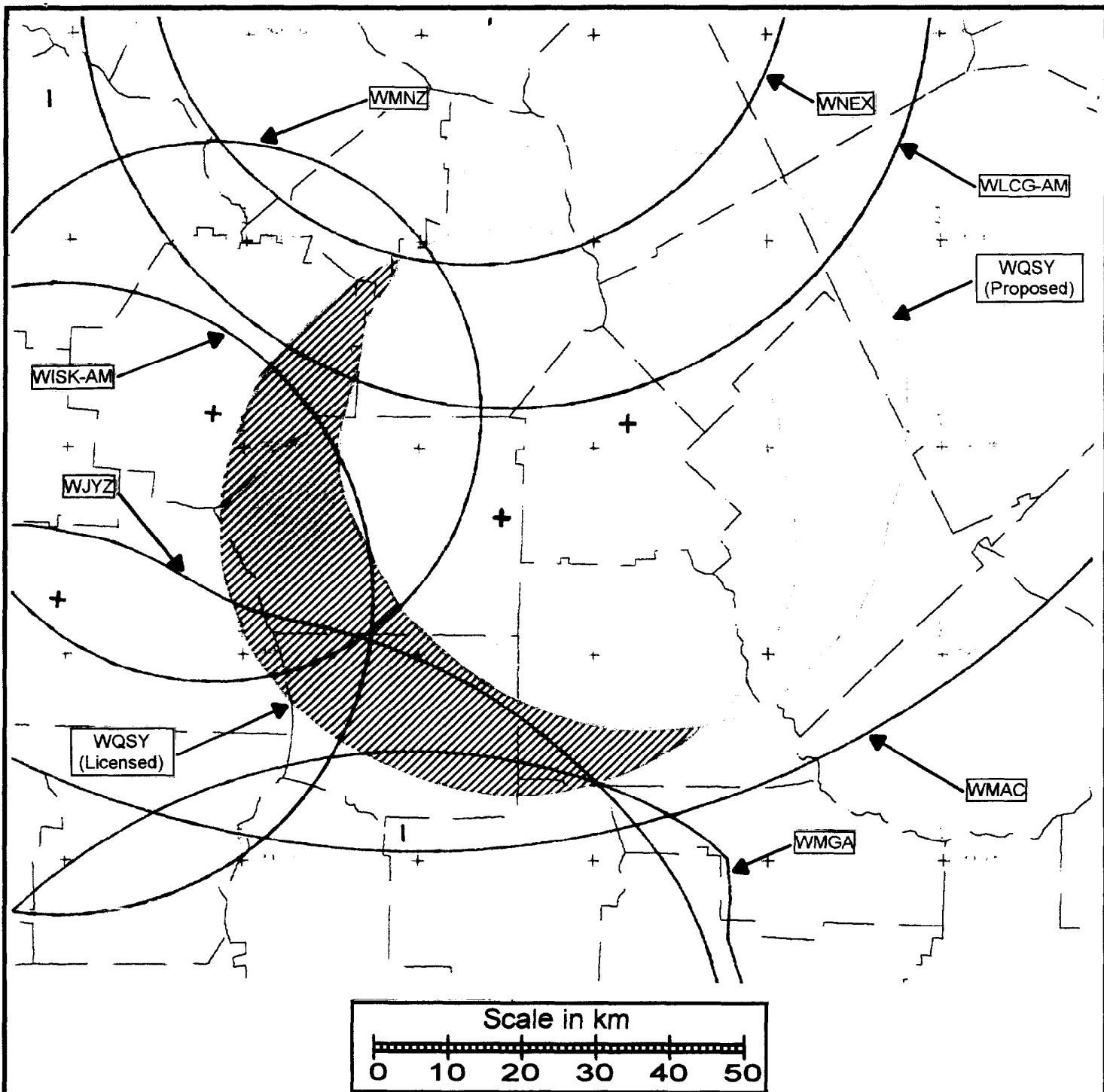
Comments to

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AM Services to Loss Area

Shaded Area = Loss Area

All AM contours are 0.5 mV/m

Map generated using InterDLG from V-Soft Communications

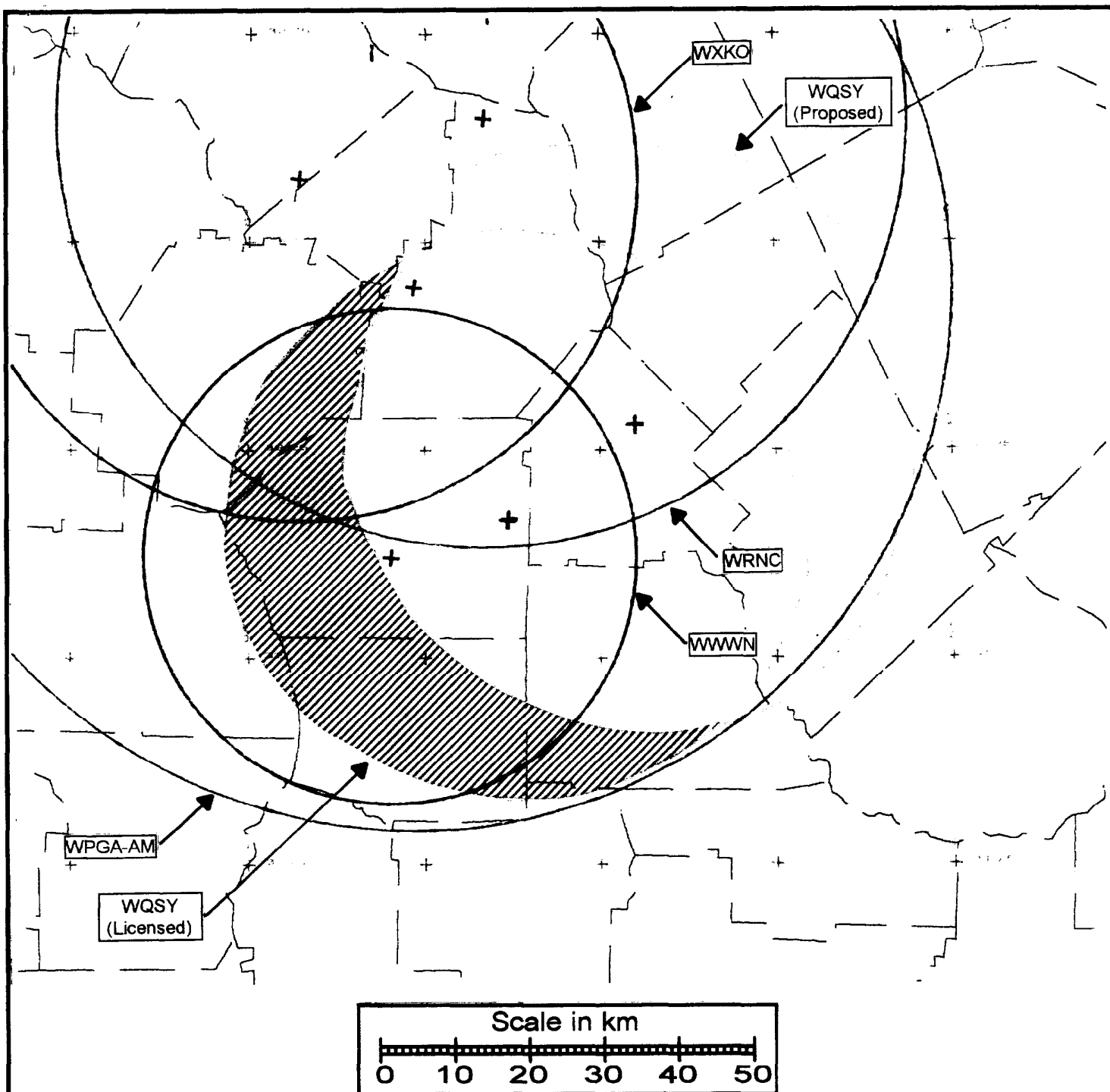
EXHIBIT #3B

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AM Services to Loss Area

Shaded Area = Loss Area

All AM contours are 0.5 mV/m

Map generated using InterDLG from V-Soft Communications

EXHIBIT #3C

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